

EXHIBIT G



GRANTED

EFiled: Feb 14 2022 03:08PM EST
Transaction ID 67314409
Case No. Multi-Case



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

DORIS SHENWICK TRUST,
derivatively on behalf of Nominal
Defendant ROCKET COMPANIES,
INC.,

Plaintiff,

v.

DANIEL GILBERT and ROCK
HOLDINGS, INC.,

Defendants,

-and-

ROCKET COMPANIES, INC.,

Nominal Defendant.

C.A. No. 2021-1021 KSJM

CHRISTOPHER VARGOSHE,
derivatively on behalf of ROCKET
COMPANIES INC.,

Plaintiff,

v.

DANIEL GILBERT and ROCK
HOLDINGS, INC.,

Defendants,

-and-

ROCKET COMPANIES, INC.,

Nominal Defendant.

C.A. No. 2022-0116-KSJM

**STIPULATION AND [PROPOSED] ORDER FOR
CONSOLIDATION AND APPOINTMENT OF CO-LEAD PLAINTIFFS
AND CO-LEAD PLAINTIFFS' COUNSEL**

WHEREAS, on December 14, 2021, the Doris Shenwick Trust (“Shenwick”), on behalf of Nominal Defendant Rocket Companies, Inc. (“Rocket”), filed an Amended Verified Stockholder Derivative Complaint against Daniel Gilbert and Rock Holdings, Inc. (C.A. No. 2021-1021-KSJM);

WHEREAS, on February 2, 2022, Christopher Vargoshe (“Vargoshe”), on behalf of Nominal Defendant Rocket Companies, Inc. (“Rocket”), filed a Verified Stockholder Derivative Complaint against Daniel Gilbert and Rock Holdings, Inc. (C.A. No. 2022-0116-KSJM);

WHEREAS, the claims asserted in both of the above-described actions challenge similar alleged conduct by the Defendants named in those actions and involve common questions of law and fact;

WHEREAS, the parties agree that consolidation of the above-captioned actions is appropriate under Court of Chancery Rule 42(a), which provides that: “[w]hen actions involving a common question of law or fact are pending before the Court, it may order a joint hearing or trial of any or all matters in issue in the actions; it may order all the actions consolidated; and it may make such orders concerning proceedings therein as may tend to avoid unnecessary cost or delay”;

WHEREAS, Plaintiffs Shenwick and Vargoshe believe that their appointment as Co-Lead Plaintiffs and the appointment of their respective chosen counsel, Grant & Eisenhofer P.A. (“G&E”) and Abraham, Fruchter & Twersky LLP (“AFT”) as

Co-Lead Counsel is appropriate to ensure that the actions are prosecuted effectively and efficiently¹;

WHEREAS, it appearing that the above-captioned actions involve the same subject matter, and that the administration of justice would be best served by consolidating the actions filed by Plaintiffs; and

WHEREAS, the parties have further agreed on certain terms, noted below;

IT IS HEREBY ORDERED, this _____ day of February, 2022:

1. The above-captioned actions are consolidated for all purposes into Civil Action No. 2021-1021-KSJM (the “Consolidated Action”).

2. All documents previously filed to date in either of the cases consolidated herein shall be deemed part of the record in the Consolidated Action.

3. All pleadings, discovery, and other documents filed, served, produced, or otherwise provided by any party to any other party in the Consolidated Action shall be produced or provided to all parties in the Consolidated Action.

4. The Consolidated Action shall bear the following caption:

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE ROCKET COMPANIES, INC.)	CONSOLIDATED
STOCKHOLDER DERIVATIVE)	C.A. No. 2021-1021-KSJM
LITIGATION)	

¹ Defendants take no position on the appointment of Co-Lead Plaintiffs or the appointment, powers, or responsibilities of Plaintiffs’ Co-Lead Counsel.

5. Shenwick and Vargoshe are appointed Co-Lead Plaintiffs in the Consolidated Action.

6. G&E and AFT are appointed Co-Lead Counsel in the Consolidated Action, with Squitieri & Fearon, LLP, Gardy & Notis, LLP, and Moore Kuehn, LLP serving as Additional Counsel.

7. Plaintiffs' Co-Lead Counsel shall set policy for Plaintiffs for the prosecution of this litigation, ensure that there is no duplication of effort or unnecessary expense, coordinate on behalf of Plaintiffs the initiation and conduct of discovery proceedings, provide direction, supervision, and coordination of all activities of Plaintiffs' counsel, and have the authority to negotiate a settlement, subject to approval of Co-Lead Plaintiffs and the Court. Any agreement reached between counsel for Defendants and Plaintiffs' Co-Lead Counsel shall be binding on the other plaintiffs.

8. Plaintiffs' Co-Lead Counsel shall assume the following powers and responsibilities:

- a) coordinate and direct the preparation of pleadings;
- b) coordinate and direct the briefing and argument of motions;
- c) coordinate and direct the conduct of discovery and other pretrial proceedings;
- d) coordinate the selection of counsel to act as Plaintiffs'

spokesperson at pretrial conferences;

e) call meetings of Plaintiffs' counsel as they deem necessary and appropriate from time to time;

f) conduct any and all settlement negotiations with counsel for Defendants;

g) coordinate and direct the preparation for trial and trial of the Consolidated Action, and delegate work responsibilities to selected counsel as may be required; and

h) coordinate and direct any other matters concerning the prosecution or resolution of the Consolidated Action.

9. The complaint filed in the Vargoshe action on February 2, 2022 shall serve as the operative complaint in the Consolidated Action. Defendants need not respond to the amended complaint filed in the Shenwick action on December 14, 2021,² and the parties shall confer and submit forthwith a schedule for Defendants' response to the operative complaint in the Consolidated Action.

10. G&E shall also be responsible for coordinating all activities and appearances on behalf of plaintiffs and for the dissemination of notices and orders of this Court, as well as for communications to and from this Court. No motion,

² Defendants' response to the amended complaint in the Shenwick action is presently due on February 14, 2022.

request for discovery, or other pretrial or trial proceedings shall be initiated or filed by any plaintiff except through G&E.

11. This Order shall apply to this Consolidated Action and any future filed actions relating to the subject matter of this case. When a case that properly belongs as part of the Consolidated Action is hereafter filed in the Court, this Court requests the assistance of counsel in calling to the attention of the Court the filing of any case which might properly be consolidated as part of the Consolidated Action, and Co-Lead Counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

12. Nothing herein shall be construed as a waiver of any party's rights or positions in law or in equity, or as a waiver of any defenses that any party would otherwise have, and the parties reserve all such rights. Defendants do not waive, and expressly preserve, all potential defenses in this litigation, including but not limited to defenses relating to service, venue or jurisdiction. Nothing in this Stipulation and Proposed Order shall prejudice the rights of Defendants to seek to have the Actions or the Consolidated Action stayed or dismissed in favor of litigations in other courts or the rights of Plaintiffs to oppose any such request.

SO STIPULATED AND AGREED by and between the parties this 10th day of February, 2022.

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*Counsel for Defendants Daniel Gilbert
& Rock Holdings Inc.*

SO ORDERED, this ____ day of _____, 2022.

Chancellor Kathaleen St. Jude McCormick

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Multi-Case

File & Serve

Transaction ID: 67307868

Current Date: Feb 14, 2022

Case Number: Multi-Case

Case Name: Multi-Case

Court Authorizer: Kathaleen St Jude McCormick

/s/ Judge Kathaleen St Jude McCormick